



PHILIP D. MURPHY
Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 112
TRENTON, NJ 08625-0112

MATTHEW J. PLATKIN
Attorney General

TAHESHA L. WAY
Lt. Governor

MICHAEL C. WALTERS
Acting Director

July 22, 2025

IT IS SO ORDERED
this 23rd day of July 2025

Via CM/ECF

Honorable Justin T. Quinn, U.S.M.J.
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608


Hon. Justin T. Quinn, U.S.M.J.

ORDER

Re: Ron Doe v. Richard Burnadz, et al.,
Civil Action No.: 3:25-cv-01976 (ZNQ-JTQ)

Dear Judge Quinn:

I represent Defendants, Colonel Patrick J. Callahan and New Jersey State Troopers Richard Burnadz, Colon Gano and Nicholas Parisi ("Defendants"), in the above-entitled matter. I write to respectfully request an additional two-weeks in which to respond to the Complaint in this matter.

On May 5, 2025, the Defendants executed waivers of service, which made their answer due June 23, 2025. On July 9, 2025, the Court granted the Defendants' request for a 30-day extension to July 23, 2025, in which to respond. However, I request an additional two weeks to August 6, 2025, to respond on behalf of the Defendants.

I request additional time because the Defendants' initial pleading in this matter will be a motion to partially dismiss the Complaint and for partial summary judgment. The partial summary judgment motion needs to be supported by documents and verifications from another State agency. As of this date, I am still



Hon. Justin T. Quinn, U.S.M.J.
July 22, 2025
Page 2

working on securing the necessary documents needed for the motion. Therefore, I respectfully request an additional two weeks to do so.

On this date, I contacted Plaintiff's counsel, Mr. Jeffrey Patti, Esq., and he consented to this request. Should the Court grant this request, the Defendants' response will be filed on or before August 6, 2025. I thank the Court for its attention to this request.

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: s/Marvin L. Freeman
Marvin L. Freeman
Deputy Attorney General

cc: **Via CM/ECF only**
All counsel of record